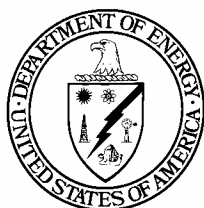


West Valley Nuclear Services Company

Report from the DOE Voluntary Protection Program On-site Review



U.S. Department of Energy

Office of Environment, Safety and Health
Office of Corporate Performance Assessment
Office of Quality Assurance Programs
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“...Some of us will serve in government for a season; others will spend an entire career here. But all of us should dedicate ourselves to great goals: We are not here to mark time, but to make progress, to achieve results, and to leave a record of excellence.”

- George W. Bush
President of the United States
October 15, 2001
Constitution Hall, Washington, D.C.

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Abbreviations and Acronyms

AED	automated external defibrillator
BLS	Bureau of Labor Statistics
CAIRS	Computer Accident/Incident Reporting System
CHEST	Council of Health, Environment, and Safety Technologists
CIH	Certified Industrial Hygienist
CSC	Central Safety Committee
CSP	Certified Safety Professionals
DART	Days Away, Restricted, Transferred
D&D	Decontamination and Decommissioning
DOE	U.S. Department of Energy
DOE-VPP	U.S. Department of Energy Voluntary Protection Program
ES&H	Environment, Safety and Health
ESH&Q	Environment, Safety, Health, and Quality
EH	Office of Environment, Safety and Health
EMT	Emergency Medical Technician
IAP	Integrated Assessment Program
IS & HS	Industrial Safety and Health Services
ISMS	Integrated Safety Management System
JHA	Job Hazard Analysis
LL	Lessons Learned
RN	Registered Nurse
ORPS	Occurrence Reporting and Processing System
OSHA	Occupational Safety and Health Administration
PPE	Personal Protective Equipment
RHWF	Remote Handled Waste Facility
S&H	Safety and Health
SGE	Special Government Employee
SME	subject matter expert
SSA	Site Safety Assessment
SST	Safety Success Team
STS	Safety Trained Supervisors
TRC	Total Recordable Case
TRMS	Training Records Management System
VPP	Voluntary Protection Program
WIP	Work in Progress
WVDP	West Valley Demonstration Project
WVNSCO	West Valley Nuclear Services Company

Executive Summary

This report summarizes the Department of Energy (DOE) Voluntary Protection Program (VPP) recertification review of the West Valley Nuclear Services Company (WVNSCO), conducted October 17-20, 2005. The on-site review team (Team) evaluated the program documentation, conducted formal and informal interviews with associates and managers, recorded workplace observations, and analyzed the company's injury and illness experience. The Team identified and documented improvements under all of the VPP elements and concluded that WVNSCO's success in establishing exceptional employee involvement and management commitment has maintained continuous improvement since last recertification in October 2002.

Management Commitment

WVNSCO management continues to implement policies and procedures that encourage an excellent safety and health (S&H) culture. A zero tolerance policy for accidents that might result in occupational exposures and environmental contamination is continuously promoted. WVNSCO management and especially its president are involved in all aspects of the S&H program. This includes promoting safety improvement plans through active participation in the Central Safety Committee (CSC) and Safety Success Team (SST), "RAM Grams," safety awareness programs and campaigns. In addition, a number of safety related tools including brown bag lunches, posters, newsletter articles and major "zero" campaigns are used to keep safety prominent in the conscience of the West Valley workplaces. The President's Round Table meetings and an open-door policy also demonstrate management's commitment to the S&H programs at the site. Furthermore, managers actively seek employee involvement in all of the safety-related activities and programs.

Employee Involvement

WVNSCO employees understand and practice their safety responsibilities by voluntarily participating in employee-driven programs and committees. Noteworthy programs include "Time Out," which enhances workers' stop work authority to evaluate potential safety hazards.

Management empowers employees to provide input on work to be preformed. Interviews with employees indicated that they are involved in the development, review, and pre-issuance walkdowns of work instructions.

Worksite Analysis

The emphasis on management commitment and employee involvement is evident in the increased focus on the use of teams for most worksite analyses. WVNSCO has implemented programs and procedures that support a comprehensive, integrated worksite analysis system. The Team performed a thorough review of the processes comprising the worksite analysis program. Based on document review, analysis, and discussions, the Team concluded that all seven sub-elements of this tenet were met.

Hazard Prevention and Control

The hazards identified through WVNSCO's worksite analysis are eliminated or mitigated promptly. The employer is committed to using the proper hierarchy of hazard control. The Team observed extensive reliance on engineering controls. The programs and processes reflect integration with the other DOE-VPP tenets and meet the requirements for this tenet.

Safety and Health Training

All work-planning activities include a discussion of the required training and knowledge needed for the project at hand. Employees receive a comprehensive set of safety training courses and the caliber, quantity, and quality of available training is perceived to be very high. The Health and Safety Training Compliance Tracking System is effectively used to help the site ensure employee training and qualification currency. In addition, employees have complete access to their own training records.

Conclusion

The Team unanimously recommended that WVNSCO be recertified as DOE Star Site.

I. Introduction

This report provides an update on the status of the occupational safety and health program at WVNSCO. The Team, consisting of four members from DOE-Headquarters, Dyn McDermott Company, and Honeywell Federal Manufacturing & Technologies (See Appendix A), performed a review October 17-20, 2005. The review consisted of a comprehensive analysis of program documents, interviews with management and employees, and workplace tours and spot checks. WVNSCO received Star level recognition under the DOE-VPP in November 1999 and recertified as a DOE-VPP Star Site in October 2002.

The report presents the Team's analysis and results from the re-evaluation of WVNSCO's activities to consider the site for recertification under the DOE-VPP. It reflects extensive document review and analysis as well as the results of employee and management interviews and workplace observations. The recertification process focused on significant changes and improvements to WVNSCO's safety and health program since its recertification in 2002. The site is located on 220 acres about 40 miles south of Buffalo, New York. WVNSCO currently employs 402 people, including subcontractors.

Congress enacted the West Valley Demonstration Project (WVDP) Act in 1980 to solidify liquid high-level radioactive waste for safe transportation and permanent disposal in a Federal repository. The waste resulted from spent nuclear fuel reprocessing conducted by a commercial operator between 1966 and 1972. The primary focus of WVDP operations from the project's inception in the early 1980's until September 2002 was the solidification of the liquid high-level radioactive waste into a stable glass waste form. In September 2002, the vitrification facility melter was safely shut down following over six years of processing and filling 275 high-level waste canisters. These canisters are currently in storage onsite awaiting transportation to the Yucca Mountain Repository.

The primary areas of work at this time include decontaminating the waste tank farm, waste characterization, and preparing for waste management and decommissioning. The main hazards at the site are considered unique or normal. The unique hazards include removable contamination and high-level ionizing radiation. Normal hazards are associated with chemical handling operations, plant maintenance, and large-scale construction. All work at the site is projected to be completed in 2012.

Changes since last recertification in 2002

1. Workforce reduced by 20 percent.
2. Industrial Safety Director now reports directly to the President.
3. Health Services were transferred to the Safety Organization.
4. Total Recordable Case (TRC) rates and Days Away Restricted Transfer (DART) rates were reduced.
5. Most of the temporary offices (trailers) were removed from the site.

II. Injury and Illness Rate Information and Trends

A review of the Occupational Safety and Health Administration (OSHA) 200/300 logs was performed. The rates below include all WVNSCO employees.

INJURY AND ILLNESS DATA FOR WVNSCO					
Calendar Year	DART Injury Cases	Total Recordable Cases	Employee Hours	DART Rate	Total Recordable Case Incident Rate
2002	11	17	1,300,067	1.69	2.62
2003	1	3	1,366,687	0.14	0.43
2004	0	1	1,224,155	0	0.16
3-Year Average			1,296,970	0.61	1.07
Bureau of Labor Statistics (BLS) 3 yr average for NAICS 4953				5.9	10.8
WVNSCO percent below BLS rate				89.7	90.1

The information on the OSHA 200/300 logs supports the data provided in WVNSCO's self-evaluations, the organization's first report of injury forms, and other recordkeeping documents. A WVNSCO health and safety professional is responsible for chairing a team of environment, safety & health (ES&H), and medical professionals for classifying all injuries and illnesses for OSHA recording and for maintaining the OSHA log. Injury/illness data is submitted for inclusion in the DOE Computerized Accident/Incident Reporting System (CAIRS). Routinely, the data output from CAIRS is checked against the actual data reported and submitted. This ensures that accurate information is being presented in the CAIRS database. The staff understands the recordkeeping requirements, including the 29 CFR 1904 recordkeeping changes that went into effect in January 2002.

III. Summary of Performance Related to VPP Tenets and Sub-elements

1.0 Management Commitment

WVNSCO continues to demonstrate a high level of management leadership in maintaining and improving the site's occupational safety and health program. Since receiving DOE-VPP Star certification in October 1999 and recertification in October 2002, WVNSCO has continued to hold managers accountable for making safety a priority.

A variety of training programs, safety campaigns, and other programs have been developed and implemented since Star recognition. Current programs have benefited from the three years of maturing experience and continual improvement. Safety Trained Supervisors (STS) is a certification program sponsored by the Council of Health, Environment and Safety Technologists (CHEST) organization for operators, supervisors, managers, safety committee members, and other work group members who play an important role in workplace safety. WVNSCO has 85 STS including managers and workers.

"Take Five for Safety" is a safety communications program covering current safety statistics and a safety topic of the week. The topics are derived from various sources including lessons learned, critiques, work scopes, and safety communication recommendations. Examples include winter driving, electrical safety, overhead hazards, right-to-know, eye safety, and lockout/tagout. WVNSCO has another program called "Safety Take Outs" for safety meeting information. There are over 20 topics in the Safety Take Outs program.

Over the last three years, WVNSCO substantially reduced the size of its workforce. In order to minimize reduction-in-force, 10 non-exempt and 14 janitorial personnel were given an opportunity to become decontamination and decommissioning (D&D) operators after training and mentoring.

The Team's observations through employee interviews, the President's Round Table meetings, brown bag lunches, and the open-door policy, concluded that management is genuinely concerned with keeping communications open with all employees. Interviews with upper and mid-level managers revealed a strong interest and belief that S&H programs need to be continually modified and improved to maintain worker interest and to strengthen program effectiveness.

All injuries and illnesses including first aid cases are reviewed. All mishaps or events are investigated. WVNSCO employs a team approach for these reviews and investigations, utilizing subject matter experts (SMEs) as appropriate. Root causes are identified to prevent recurrence.

WVNSCO has also continued to improve management accountability for S&H. Interviews with management and discussions with employees indicated that managers are held accountable for safety.

WNSCO management has continued to apply adequate resources to its safety programs. These include the aggressive promotion of safety awareness programs (e.g., "Adopt a Walkway,"

electrical safety), and maintaining training qualifications of employees. The Team's observation concludes that management is genuine in keeping communication lines open with all associates.

WVNSCO has an Employee Concern Program that provides a process for employees to formally report conditions pertaining to environment, health, safety, fraud, waste and abuse, security, suspected illegal or improper activity, management, quality, or work. The concerns are recorded on a form or in letters and forwarded to the employee concern representative for monitoring and closure. A timely response is provided to the originator of the concern.

The Team concluded that WVNSCO satisfies the management commitment tenet of the DOE-VPP.

2.0 Employee Involvement

Information was gathered from 16 formal interviews of approximately 15 percent of the hourly personnel. All were represented by the collective bargaining unit from the International Association of Machinists and Aerospace Workers. The time of service for the interviewees ranged from 8 to 27 years. The topics addressed included community involvement, training, intervention, and safety committee participation.

All personnel were very helpful and conducted themselves in a professional manner during the interviews. Interviewees were upbeat, open, and informative about the project.

Findings from the interviewees suggested that employees are very active in the community. They are involved with organizing Days of Caring, conducting safety exhibits at community events, assisting outside emergency medical service systems in the area with drills, conducting radiation testing for city emergency drills, mentoring future VPP sites, and instructing automated external defibrillator (AED) classes for the residents of Springville, N.Y.

Employees are encouraged to participate in non-mandatory training such as CPR, STS, OSHA classes, first aid, asbestos training, and AED training.

All parties (employees, management, and union) are proactive about usage of the stop work/time out as a hazard control method. The employees were asked if they had ever used the stop work/time out. All those interviewed stated that they understood their responsibility to use this to mitigate for a serious safety concern. Most of those interviewed stated that they had used this hazard control method at least one time. All parties are also proactive in the Employee Concerns Program, which is one method of vocalizing S&H concerns.

When the employees were questioned about intervention (watching out for each other's safety), all stated that they practice this all the time. Everyone seems concerned about one another and wants to leave the facility in the same or better condition than when they arrived. Almost all of the employees stated that they believed management had their best interest in mind regarding S&H. All stated that when a safety concern was brought to the attention of management it was resolved in a timely manner. However, there were concerns about training for the junior workers. The president of the local union stated that this concern was part of the recent negotiations and is now part of the contract. The employees with more seniority consistently

helped the junior employees suit-up and verified one another's personal protective equipment (PPE).

All interviewees indicated awareness of the various safety committees and outreach programs at WVNSCO. They understand that membership of these safety committees is voluntary and that time is allocated on the schedule for these commitments.

Recommendations:

- The company should continue to encourage training outside job requirements (especially CPR, first aid, and AED usage).
- Employees and managers should continue to support the safety committees and community outreach programs.

The Team concluded that the WVNSCO satisfies the employee involvement tenet of the DOE-VPP.

3.0 Worksite Analysis

The on-site review clearly indicated that WVNSCO has a strong program to identify and characterize hazards in the workplace and to mitigate the hazardous conditions. Strong management commitment and employee involvement have helped to ensure WVNSCO as a safe work environment.

The site is going through a rapid change in mission (from an operations and maintenance facility to a D&D facility) where the workers are performing characterization activities, facility dismantlement, waste packaging and shipping, and final closure of facilities. The management is cognizant of this transition and has shifted the workforce to appropriately capitalize on special skills for the completion of the remaining work. There has also been significant reduction in workforce; however, the impact has been mostly in professional staff and not in the labor force. Some of the excess staff are being developed and trained to perform mission-related activities.

WVNSCO management and workers, experienced and dedicated, have demonstrated a strong safety culture and have a clear understanding and knowledge of the hazards of various activities being performed at the site. The WVNSCO president frequently visits workspaces throughout the site and communicates with the workers. Management commitment is demonstrated by their participation in the CSC, the SST, and field walkdowns. In addition, subcontractor coverage within radiation protection has been improved. The subcontractor employees are required to take hazard-recognition training courses and are expected to follow WVNSCO's safety policy.

3.1 Pre-use/Pre-Startup Analysis

WVNSCO performs a comprehensive and systemic readiness evaluation using established procedures prior to starting up new facilities, implementing processes and activities, and introducing new equipment and materials. The WVDP Integrated Safety Management System (ISMS) dictates safety to be an essential ingredient in work planning. The hazard screening process at WVDP applies to all planned work including work instruction packages

(major modifications), standard operating procedures (for routine work), and purchase requisitions to ensure safety measures are considered before starting work. Appropriate budget and safety department reviews are included in project planning and budgeting of safety.

Prior to the startup of a completed project, WVNSCO performs a line management self-assessment and a contractor operational readiness review. Among the projects that have been subject to such assessments are the Remote Handled Waste Facility (RHWF), Sodium Bearing Waste Disposition and LSA-4 Waste Sorting area. There are also additional audits by the WVNSCO Quality Assurance Department to assess the implementation and adequacy of the corrective actions resulting from internal and external line management assessments and readiness reviews.

Mock-ups continue to be used prior to engaging in complex hazardous work or at the request of employees performing a task to familiarize personnel with procedures, the process and/or equipment, and the interfaces within the phases of the task. Mock-ups have been used successfully for both large and small jobs such as performing facility dismantlement (e.g., Head End cells) and waste sorting and retrieval.

3.2 Comprehensive Surveys

WVNSCO continues to maintain a comprehensive survey program, which includes quarterly full-site walkthroughs performed by the safety department. The site hazards surveys have been revised to reflect changes in the site's activities and operational startup of RHWF. As a result, a number of operational emergency events have been changed and/or reduced.

3.3 Routine Hazard Assessments (self-inspections)

Routine hazard assessments are performed via a number of separate activities including quarterly walkthroughs of the entire site by the Industrial Safety & Health Services (IS&HS) department and an annual hazard assessment which is used to update the hazard assessment database. Facility owners are responsible for walkthroughs on a regular basis of their facility. Additionally, the SST performs monthly safety walkthroughs and reviews the findings with the WVNSCO president. The VPP team observed the workings of the SST in a safety issue case raised by the workers in a SST meeting regarding movement of fork trucks in one of the waste storage buildings. After an on-site review and recommendations to the president of WVNSCO by the SST, necessary remedial actions were taken by management to alleviate the safety issue.

Overall, WVNSCO performs numerous environment, safety, health & quality (ESH&Q) assessments per year according to their Integrated Assessment Program (IAP), which is a risk-based assessment program applying assessment resources to higher risk areas important to the protection of the worker, the public and the environment. In general, very few significant issues that could have an impact on health and/or safety have been reported from the assessments.

3.4 Routine Hazard Analysis

The hazards associated with the work to be performed are routinely evaluated using a revised hazard screening process and with a significantly larger number of trained workforce. Workers, supervisors and SMEs are involved from the very beginning of a job development to assess hazards of the activities and propose solutions to mitigate the hazards. An independent work review group reviews all work to be performed. Use of Job Hazard Analysis (JHA) and the lessons learned database are routine in the development of work instruction packages. Pre-job briefings further aid in the hazard evaluation. Post-job reviews provide appropriate feedback for inclusion in the lessons learned database. Mock-ups and models are used for complex activities to assess hazards associated with the proposed activities, to eliminate uncertainties, and to reduce worker exposure.

Although worker participation in work planning and hazard assessment/mitigation is quite evident, the Team believes, based in part on conversations with the workers and on-site review of certain work activities, that there is room for improvement in these areas.

3.5 Employee Reporting of Hazards

During the interview, it was apparent that there are several avenues available for WVNSCO employees to report hazards. The management has placed strong emphasis on the worker's right and authority to identify unsafe conditions and to utilize stop work/time outs to rectify the unsafe conditions. This is in addition to the hazards identified during pre-job walkdowns, reviews, and briefings. Other reporting mechanisms include direct communication to the safety committees, a formal safety concern program, employee concerns hotline, the Safety Department, and an issues reporting program. Furthermore, WVNSCO has an open-door policy in which employees can report a concern at any time to supervisors, union representatives, ES&H representatives or through the Safety Department. Informal interviews revealed site personnel most often use the open-door policy or chain of command to report safety concerns. All persons interviewed indicated that they had no apprehension to report hazards and no fear of reprisal. Identified hazards were said to be addressed in a timely and satisfactory manner.

3.6 Accident Investigations

Accidents and near miss incidents involving safety are routinely investigated and corrective actions are implemented and tracked for completion using a procedure developed by the IS & HS department. The Safety Department also reviews these accidents and incidents for trends and programmatic issues. The safety statistics and trends are reported to the Central Safety Committee (consisting of workers, supervisors, and managers). Focusing on the future, these investigations have resulted in initiatives for prevention of potential accidents and unsafe conditions identified from waste packaging, fork truck operation, heat stress, and insect bites. Site safety concerns are also widely disseminated among the employees through special bulletins from the president of WVNSCO.

Over the past several years, WVNSCO has executed significant tasks, such as off-site spent fuel shipment, dismantling of highly contaminated equipment, piping, vessels, and radioactive waste handling, storage, and shipping, with few OSHA recordable injuries.

3.7 Trend Analysis

WVNSCO utilizes safety statistics and trend analysis to review safety objectives, to identify ES&H program deficiencies, to facilitate program improvements, and to embark on initiatives for prevention. For example, WVNSCO management noted a trend of increased hand injuries and opted for new gloves to be distributed to the operators along with hand safety briefings. This resulted in a very significant reduction in injuries to the hand. Other outcomes of analyzing safety statistics and trends have included adding several safety campaigns, such as the summer safety campaign to reduce heat stress and insect bites.

The Nuclear Safety & Emergency Management Department at WVNSCO maintains a trend analysis program. Data is collected from all workforces, including subcontractors, based on first aid cases, accident investigation results, OSHA recordable cases, audit findings, and ES&H concern line information. Analysis of incidents by type of injury, body part, location on-site, and source of injury are also reported.

The trend analysis data is presented monthly to general management at the CSC, distributed to division managers, and posted on the ES&H website. The data is reviewed on an annual basis to determine where to focus resources to reduce the injury/illness rates.

3.8 Lessons Learned

There is a continuing emphasis at WVNSCO on the Lessons Learned (LL) Program, which is endorsed by senior management. A LL coordinator within the Nuclear Safety & Emergency Management Department (under the direction of the Nuclear Safety & Emergency Management manager) is assigned responsibilities for program tasks: screening, characterizing, summarizing, and dissemination of LL information.

Sources of LL information include DOE's Occurrence Reporting and Processing System (ORPS) reports, formal DOE lessons learned circulars, and internally WVNSCO generated information from work completed. WVNSCO procedure requires any applicable LL be attached to the Work in Progress (WIP) at the closure of a task. LL is distributed to managers, supervisors, workers, and subcontractors. In some instances, the cognizant managers make reading of certain LL by the subordinates mandatory. Use of LL from previous similar activity in the dismantlement of the Extraction Cell-2 Project was noted during interviews with the employees. At WVNSCO, the LL program is regarded as an important tool in performing a task correctly and there is an effort for continuous improvement in enhancing the use of LL.

Conclusion

The Team concluded that WVNSCO meets the worksite analysis DOE-VPP tenet.

4.0 Hazard Prevention and Control

4.1 Access to Certified Professionals

The WVNSCO occupational safety and health staff has ten permanent and subcontracted S&H professionals. Currently, two staff members are Certified Health and Safety Technicians and another is in the process of obtaining certification. The manager will be taking the Certified Safety Professional (CSP) exam in the near future bringing the total to 3 CSPs. Approval has been received to add another field support member to the safety and health team. The size of the professional S&H staff is augmented by the increased integration of the line supervisors and managers, which have been trained to the STS level. The Certified Industrial Hygienist (CIH) for the facility currently is on-site three days a week and on-call the remaining days.

The radiation section is currently staffed by 12 company and 25 contractor radiation technicians. These radiation technicians operate from a different directorate and ensure that personnel are not exposed to excess radiation. An additional technician maintains the personnel radiation exposure database.

Both the occupational safety and health staff and the radiation safety staff participate in hazard analysis and control, workplace safety, incident investigation, and corrective action, as well as training of site personnel.

4.2 Methods of Hazard Control

WVNSCO continues to pro-actively control and eliminate hazards in their workplace. The company stresses the use of process/material evaluation and substitution, engineering controls, as well as administrative controls in the first tier of control. If the hazard cannot be mitigated using these methods, PPE will be utilized. An example of this approach is the foam packaging area. The company successfully engineered personnel contact with the isocyanate-containing foam precursors out of the work stream. Another example of an engineering control in use was the development of the tipper table, which eliminated the use of personnel to manually dump box/package contents. The company is also re-engineering the depot area to allow better access.

An ergonomics program has been successful in keeping musculoskeletal injuries very low. Workstation evaluations continue to be conducted and improvements implemented. The company plans on another organization-wide ergonomic evaluation once personnel have been located in permanent facilities. Special attention continues in the remote access workstations where robotics are utilized to eliminate human contact with high radioactivity areas.

The SST consists of line personnel and union officials. This committee collects and investigates safety concerns. Items that demand a larger scope of work are transferred to the CSC. The CSC consists of management, union, and line personnel. The SST performs walkthroughs of the facility to identify safety and health concerns. Senior management also conducts safety and health walkthroughs. The current walkthroughs are in preparation for snowfall. In addition, the Electrical Safety Team is heavily involved in updating and implementing the arc flash and electrical safety standards.

The Industrial Hygiene staff continues to monitor employees for exposure to both chemical and physical agents. Results of monitoring are provided to employees in a timely manner.

Multiple entities (maintenance, safety/health, engineers, etc.) are involved in the planning of future work in order to minimize or eliminate potential hazards. This system appears to be working very well.

4.3 Positive Reinforcement

Employees interviewed during the re-evaluation strongly support the positive reinforcement efforts by management to encourage the expansion of the safe work culture at the facility. The following programs are used to reward positive safety behavior.

- Safety Scratch-off Cards
- Safety Achievers
- Lion Awards
- Washington Group International Safe Project of the Year

In addition, the company utilizes the Employee Concerns Program, which encourages employees to voice concerns about safety in the workplace. Lessons learned (such as the C470 bridge incident) are used to reinforce positive safety practices among employees.

4.4 Disciplinary System

The company continues to effectively implement and apply a written disciplinary program. Interviews with employees indicated that very few have encountered the disciplinary program, thus suggesting that the positive encouragement of safe practices by fellow employees is keeping discipline issues to a minimum.

4.5 Preventive Maintenance

WVDP equipment is cataloged in an electronic database containing the repair and preventative maintenance information. The main improvement in the preventative maintenance and repair system is the introduction of mockups and practice repairs on identical equipment outside of the cells. This allows maintenance personnel to work on equipment suited up and verify tool inventory before proceeding into the cell for actual repairs. This has dramatically reduced repair costs in terms of labor, time, and suits.

4.6 Emergency Preparedness and Response

The company continues to perform emergency drills in order to keep emergency preparedness high. The site participates in mutual aid agreements with local agencies (including Cattaraugus County HazMat Team and West Valley Hose Company) and in local emergency drills. Informal employee interviews indicated participation in emergency drills.

4.7 Medical Programs

The medical program is overseen by an occupational medicine physician in California who has made numerous visits to the site. The site has a resident registered nurse (RN) to provide medical support. Routine medical exams (pre- and post-employment physicals, respiratory protection physicals) are performed by the Site Occupational Medical Director and by a local Occupational Medicine clinic in West Seneca, which is located about 30 minutes from the site. Emergency medical treatment is initiated by the site Emergency Medical Technicians (EMTs) and if warranted, can be transferred to Springville Hospital which is located about 12 minutes from the site. The company has four AEDs (three at the site and one at the off-site office building) and AED trained personnel are always available.

Conclusion

The team concluded that all aspects of the hazard prevention and control tenet of the DOE-VPP program are being maintained at levels well above expectations.

5.0 Safety and Health Training

The S&H training processes used at the WVNSCO are structured and implemented according to Integrated Safety Management (ISM) core functions and guiding principles. These processes adequately train workers, supervisors, and managers in recognizing hazards and performing work safely. Associates who were interviewed during this review, as well as observations made by the Team, confirmed that these processes are used and understood throughout the organization.

WVNSCO has made a concerted effort to train associates on the hazards they face at work and at home. Some topics of training for home safety and health include vehicular safety, fire safety, hunting safety, and electrical hazard safety. Associates interviewed stated that they were very impressed with this level of safety training. Many associates remarked that they had changed their safety practices at home due to the training received at WVNSCO.

The computerized training tracking system, Training Records Management System (TRMS), is exemplary. This system individually tracks each associate's training and notifies them 45 days in advance of a training due date.

WVNSCO fully satisfies the requirements of the safety and health training tenet.

IV. Outreach

WVNSCO has an active outreach and mentoring program in western New York. Since recertification in 2002, WVNSCO has mentored Mollenberg-Benz (Buffalo, N.Y.), a mechanical contracting company for the U.S. Postal Service Rochester Processing and Distribution Center. Mollenberg-Benz received a VPP Star flag in May 2003. WVNSCO has also assisted other organizations such as the New York Department of Transportation with their safety programs. In addition, WVNSCO employee Ann Schubert was trained as a Special Government Employee (SGE) by OSHA and served on the OSHA VPP Team for Goodyear Tire and Rubber Company in Niagara Falls, N.Y.

V. Strengths

During this review, the Team noted several strengths within WVNSCO that are indicative of a healthy and comprehensive safety culture. The ISMS principles and methodologies are evident in these behaviors and practices and illustrate the depth and scope to which their values simulate the five main tenets of DOE-VPP. Listed below are the strengths noted by the Team during this review.

1. WVNSCO exhibits a strong safety culture.
2. WVNSCO has experienced and dedicated workers and managers.
3. WVNSCO has continued operations with minimal reportables.

VI. Best Practices

The Team noted the following best practices at WVNSCO.

1. "Time Out" program to evaluate potential safety hazards
2. Mentor employees (office and janitorial workers) who would have lost their jobs as technicians and other site worker positions

VII. Areas of Improvement

The Team identified five areas of needed improvement during this review. Listed below are some suggestions of improvements.

1. Improve success of Mentoring Program by ensuring compatibility between mentor-mentored partnerships.
2. Strengthen the Employee Recognition Program.
3. Increase operator participation in hazard assessment and mitigation.
4. Increase involvement of operator/maintenance in early phase of work planning.
5. Improve dissemination of post-job lessons learned.

VII. Conclusion

Based on interviews, observations, and documentation reviews, the Team unanimously recommends that WVNSCO be recertified as a DOE –VPP Star Site.

APPENDIX A: On-site VPP Recertification Team Members

Name	Organization	Assigned Area
Steve Singal Team Leader	Department of Energy EH-31	Management Commitment Safety & Health Training
Dr. Subir Sen Assistant Team Leader	Department of Energy EH-31	Worksite Analysis
Jim Bears	Honeywell Federal Manufacturing & Technologies Kansas City Plant	Employee Involvement
James DiPoli	Dyn McDermott Strategic Petroleum Reserve	Hazard Prevention and Control